

1 William A. Daniels, Esq. (SBN 172 2)

2 [Redacted]
3 [Redacted]
4 [Redacted]

5 Attorneys for Plaintiff, [Redacted]

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES - CENTRAL**

10

11 [Redacted]
12 [Redacted] Plaintiff,

13 vs.

14 [Redacted]
15 [Redacted]
16 [Redacted]
17 [Redacted] Defendants.

CASE NO. [Redacted]
Case Assigned to: Hon. Ronald M. Sohigian
Dept.: "41"

Complaint filed on [Redacted]

**NOTICE OF TAKING DEPOSITION OF
PERSON MOST QUALIFIED WITH
PRODUCTION OF DOCUMENTS**

Date: [Redacted]
Time: [Redacted]
Location: [Redacted]

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21 TO DEFENDANTS [Redacted]

22 [Redacted] AND TO THEIR ATTORNEYS OF RECORD

23 HEREIN:

24 **NOTICE IS HEREBY GIVEN** that Plaintiff will take the following depositions:

25 1. The Person Most Qualified to testify regarding handling of the subject
26 claim, No. [Redacted] on **May [Redacted]** at **3:00 p.m.**

27 2. The Person Most Qualified to testify regarding underwriting of the
28 subject policy, Nos. [Redacted] and [Redacted] on **May 9, [Redacted]** at **4:00 p.m.**

1 The depositions will be taken at the law offices of [REDACTED]
2 [REDACTED]

3 Said depositions will take place before a Notary Public or Certified Court Reporter,
4 pursuant to the laws of the State of California, and will continue from day to day, excluding
5 holidays and weekends, until completed, and may be videotaped.

6 If a translator is needed, please notify Plaintiff's counsel no later than five days
7 before the date of the deposition.

8
9 **PLEASE TAKE FURTHER NOTICE** that pursuant to California Code of Civil
10 Procedure § 2031, Plaintiff requests the witnesses produce for inspection and copying at
11 said depositions the originals of the following documents:

12 (1) Each and every complete original claim files kept in connection with the
13 subject claim, No. [REDACTED] 6 , as maintained at home office, any regional office, any local
14 office or any other claims office maintaining such files, including all file contents, file
15 jackets, computer files and every e-mail.

16 (2) Each and every complete original underwriting file kept in connection with the
17 subject policy, Nos. [REDACTED] and [REDACTED] as maintained at home office, any
18 regional office, any local office or any other office maintaining such files, including all file
19 contents, file jackets, computer files and every e-mail.

20
21 Dated: [REDACTED] [REDACTED]

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23 By _____
24 William A. Daniels
25 Attorneys for Plaintiff
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